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7
8 UNITED STATES DISTRICT COURT

9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10 January 2025 Grand Jury

11 UNITED STATES OF AMERICA,

CR 2:25-cr-00249-MWC

12 Plaintiff,

I N D I C T M E N T

13 v.

[18 U.S.C. § 1343): Wire Fraud;
18 U.S.C. § 981(a)(1)(C) and 28
U.S.C. § 2461(c): Asset
Forfeiture]

14 SHUKIMBA MALIK CARLIS, and
SOFIA VANESSA HERRERA,

15 Defendants.

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17
18 The Grand Jury charges:

19 [18 U.S.C. § 1343]

20 A. INTRODUCTORY ALLEGATIONS

21 At times relevant to this Indictment:

22 1. The American Federation of State County and Municipal
Employees ("AFSCME") was a national labor union that consisted
23 of members who were employed by state and county governments.
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25 2. AFSCME Local Chapter 2620 ("Local 2620") represented
26 approximately 5,000 health and social services professionals
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1 employed by the State of California. Local 2620 had
2 headquarters in Burbank, California and Sacramento, California.

3 3. Defendant SHUKIMBA MALIK CARLIS ("CARLIS") was elected
4 as the president of Local 2620 from October 2020 until September
5 2022.

6 4. In March 2021, SOFIA VANESSA HERRERA ("HERRERA") was
7 elected as the treasurer of Local 2620. HERRERA served as
8 treasurer from March 2021 until September 2022.

9 5. As part of their roles as Local 2620 executive board
10 members, CARLIS and HERRERA held Mastercard Inc. credit cards in
11 their names. CARLIS held a Mastercard credit card ending in
12 8607 ("AFSCME Credit Card 8607"); HERRERA held a Mastercard
13 credit card ending in 8979 ("AFSCME Credit Card 8979")
14 (collectively, the "AFSCME Credit Cards").

15 6. The AFSCME credit card expenses were paid using Local
16 2620 funds from a checking account held in the name of Local
17 2620 at United Business Bank, located in Walnut Creek,
18 California.

19 7. CARLIS and HERRERA were subject to AFSCME's Financial
20 Standards Code Article VII, Section 3, which states in pertinent
21 part that "personal charges on the affiliate's credit card are
22 strictly prohibited[.]"

23 8. CARLIS and HERRERA were also subject to Local 2620's
24 written policy on use of Local 2620's credit cards, which said
25 that AFSCME credit cards could not be used for "any personal
26 item or purpose."

27 9. Per AFSCME Financial Standards Code Article V, AFSCME
28 officers, including CARLIS and HERRERA, had "a fiduciary

1 responsibility to ensure that the union's assets [were] managed
2 prudently and all expenditures [were] for the exclusive benefit
3 of the affiliate and its members."

4 10. CARLIS and HERRERA were subject to Local 2620's
5 financial reporting requirements. Under Local 2620's
6 Constitution Article XII, Section 7, HERRERA, as Local 2620's
7 treasurer, was required to provide a financial report at each
8 Local 2620 executive board meeting, which took place every other
9 month. This was to include, in part, all credit card
10 statements.

11 11. Local 2620's policy stated that anyone using an AFSCME
12 credit card had to provide an accounting of that charge on an
13 expense report, to include a credit card slip and the itemized
14 invoice. If a treasurer or president submitted the expense
15 report, their charge had to be approved by another executive
16 officer.

17 12. CARLIS and HERRERA had previously held positions as
18 trustees of Local 2620, and were aware of Local 2620's rules and
19 policies regarding credit cards and reporting requirements.

20 B. THE FRAUDULENT SCHEME

21 11. Beginning on an unknown date but no later than in or
22 about March 2021, and continuing through at least in or about
23 September 2022, in Los Angeles County, within the Central
24 District of California, and elsewhere, defendants CARLIS and
25 HERRERA, knowingly and with intent to defraud, devised,
26 participated in, and executed a scheme and artifice to obtain
27 money and property from AFSCME and Local 2620 by means of
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1 materially false and fraudulent pretenses, representations, and
2 the omission and concealment of material facts.

3 12. The fraudulent scheme operated, in substance, in the
4 following manner:

5 a. Defendants CARLIS and HERRERA used their AFSCME
6 Credit Cards to make purchases for non-AFSCME-related expenses
7 and for their personal benefits.

8 b. Defendants CARLIS and HERRERA then arranged that
9 the AFSCME credit card bills be paid using Local 2620's funds
10 from Local 2620's checking account.

11 c. As Local 2620 executive officers, CARLIS and
12 HERRERA had a duty to inform Local 2620's executive board and
13 trustees about their use of Local 2620's funds. Defendants
14 CARLIS and HERRERA omitted material facts to Local 2620
15 regarding their misuse of Local 2620 funds. To that end,
16 defendant HERRERA, with defendant CARLIS's help, did not inform
17 Local 2620's executive board or Local 2620's trustees about
18 their misuse of the AFSCME Credit Cards and Local 2620 funds and
19 repeatedly failed to provide related financial records to Local
20 2620's executive board and Local 2620's trustees.

21 d. Defendants HERRERA and CARLIS falsely stated that
22 the record detailing their credit card purchases were not ready
23 to be presented and that defendant HERRERA did not know how to
24 present the records because of inadequate training. In reality,
25 defendant HERRERA did not provide the credit card statements
26 because they showed unauthorized purchases.

27 e. Local 2620 trustee Y.C. repeatedly requested
28 financial records from defendants HERRERA and CARLIS in order to

1 audit Local 2620. On August 29, 2022, defendant CARLIS, in an
2 effort to delay this audit and further conceal her and defendant
3 HERRERA's misuse of the AFSCME Credit Cards, sent an email to
4 Y.C. suspending Y.C. from Local 2620 and prohibiting her from
5 engaging in AFSCME-related activities or business until further
6 notice.

7 f. Defendants CARLIS and HERRERA took several steps
8 to conceal their misuse of the AFSCME Credit Cards. Prior to
9 defendant CARLIS taking office, Local 2620's credit card
10 statements were mailed to Local 2620 offices. When defendant
11 Carlis became Local 2620's president, she arranged for the
12 AFSCME Credit Cards statements to be mailed to her residence
13 instead of Local 2620's offices in order to more easily conceal
14 her and defendant Herrera's unauthorized use of the AFSCME
15 Credit Cards.

16 g. On or about September 12, 2022, defendants CARLIS
17 and HERRERA called the credit card company managing the AFSCME
18 Credit Cards and placed a verbal password on the account so that
19 only defendants CARLIS and HERRERA could access the accounts
20 online.

21 13. In executing the fraudulent scheme described above,
22 defendants CARLIS and HERRERA caused Local 2620 losses of
23 approximately \$270,000.

24 C. USE OF INTERSTATE WIRES

25 14. On or about the dates set forth below, within the
26 Central District of California and elsewhere, defendant CARLIS
27 and defendant HERRERA, for the purpose of executing and
28 attempting to execute the above-described scheme to defraud,

transmitted and caused the transmission of the following items by means of wire communication in interstate commerce:

COUNT	DATE	DEFENDANT	ACT
ONE	March 31, 2022	CARLIS	Used AFSCME Credit Card 8607 to purchase \$870.53 of shoes from Jimmy Choo in Beverly Hills, California.
TWO	March 31, 2022	CARLIS	Used AFSCME Credit Card 8607 to purchase \$2,452.80 in accessories from Louis Vuitton in Beverly Hills, California.
THREE	February 11, 2022	HERRERA	Used AFSCME Credit Card 8979 to purchase \$1,756.29 of clothing and accessories from Tory Burch in Glendale, California.
FOUR	February 11, 2022	HERRERA	Used AFSCME Credit Card 8979 to purchase \$515.97 of clothing and accessories from Tory Burch in Glendale, California.
FIVE	May 12, 2022	HERRERA	Used AFSCME Credit Card 8979 to purchase \$2,033.02 of clothing and accessories from Tory Burch in Glendale, California.
SIX	May 12, 2022	HERRERA	Used AFSCME Credit Card 8979 to purchase \$108.05 of clothing and accessories from Tory Burch in Glendale, California.

1 FORFEITURE ALLEGATION
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[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of
5 America will seek forfeiture as part of any sentence, pursuant
6 to Title 18, United States Code, Section 981(a)(1)(C) and Title
7 28, United States Code, Section 2461(c), in the event of the
8 defendant's conviction of the offenses set forth in any of
9 Counts One through Six of this Indictment.

10 2. The defendant, if so convicted, shall forfeit to the
11 United States of America the following:

12 (a) All right, title, and interest in any and all
13 property, real or personal, constituting, or derived from, any
14 proceeds traceable to the offenses; and

15 (b) To the extent such property is not available for
16 forfeiture, a sum of money equal to the total value of the
17 property described in subparagraph (a).

18 3. Pursuant to Title 21, United States Code, Section
19 853(p), as incorporated by Title 28, United States Code, Section
20 2461(c), the defendant, if so convicted, shall forfeit
21 substitute property, up to the value of the property described
22 in the preceding paragraph if, as the result of any act or
23 omission of the defendant, the property described in the
24 preceding paragraph or any portion thereof (a) cannot be located
25 upon the exercise of due diligence; (b) has been transferred,
26 sold to, or deposited with a third party; (c) has been placed
27 beyond the jurisdiction of the court; (d) has been substantially

1 diminished in value; or (e) has been commingled with other
2 property that cannot be divided without difficulty.

3
4 A TRUE BILL
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7 /S/
Foreperson

8
9 BILAL A. ESSAYLI
10 United States Attorney

11 LINDSEY GREER DOTSON
12 Assistant United States Attorney
Chief, Criminal Division

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15 FRANCES S. LEWIS
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17 SHAWN ANDREWS
18 Assistant United States Attorney
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19 SARAH E. SPIELBERGER
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Asset Forfeiture & Recovery Section

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